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June 30, 2020

### VIA E.C.F.

Hon. Paul A. Engelmayer United States District Court Judge Thurgood Marshall **United States Courthouse** 40 Foley Square New York, NY 10007

Re: United States v. Christopher Simon, 18 Cr. 390 (PAE) – 2-week extension of time to file submission

# Dear Judge Engelmayer:

I write to request a 2-week extension of time to file a submission in this matter. This is the second request for an extension of time. The Government has consented to the request. The additional time is needed to continue to organize an appropriate release plan on Mr. Simon's behalf. Mr. Simon will not be able to stay with his family members upon release. I have conferred with a social worker from the Federal Defenders regarding a reentry plan, and there may be alternate options available to Mr. Simon. To properly explore those options, I will need to speak with Mr. Simon again, regarding benefits that he received prior to his arrest. I have already contacted his counselor to schedule a legal call with him. Accordingly, I request a 2-week extension of time to file a submission in this matter.

Respectfully Submitted,

Karloff C. Commissiong, Esq.

Granted. Defense counsel's submission is due July 14, 2020, and the Government's response is due July 17, 2020.

cc: A.U.S.A. Robert Sobelman (Via Electronic Mail) SO ORDERED.

United States District Judge

July 1, 2020